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and

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*Attorneys for Defendants,
 Walmart Inc. and Jetson Electric Bikes, LLC*

**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF WYOMING**

STEPHANIE WADSWORTH)
 Individually and as Parent and Legal Guardian)
 of W.W., K.W., G.W., and L.W., minor children)
 and MATTHEW WADSWORTH,)
)
 Plaintiffs,)
)
)
 v.)
)
 WALMART INC. and)
 JETSON ELECTRIC BIKES, LLC,)
)
 Defendants.)

Case No. 2:23-cv-00118-NDF
 DEFENDANTS JETSON
 ELECTRIC BIKES, LLC AND
 WALMART INC.'S MOTIONS
 IN LIMINE; MEMORANDUM
 IN SUPPORT OF MOTIONS;
 DECLARATION IN SUPPORT

I, Eugene M. LaFlamme, state as follows:

1. I am an attorney at McCoy Leavitt Laskey LLC located in Waukesha, Wisconsin.
2. I am one of the attorneys of record for Defendants, Jetson Electric Bikes, LLC and Walmart Inc., admitted *pro hac vice* on August 24, 2023.
3. Attached as Exhibit 1 are the pertinent portions of Jetson representative Sam Husain's deposition taken on May 17, 2024.
4. Attached as Exhibit 2 are the pertinent portions of Plaintiffs' fire cause expert Derek King's deposition taken on August 19, 2024.
5. Attached as Exhibit 3 are the pertinent portions of the *Kaufman* Complaint filed October 19, 2022.
6. Attached as Exhibit 4 are the pertinent portions of Plaintiffs' fire origin expert Michael Schultz's deposition taken on September 10, 2024.
7. Attached as Exhibit 5 are the pertinent portions of the *Donwell* Complaint.
8. Attached as Exhibit 6 is the CPSC Hoverboard Safety Alert issued November 2017, previously marked as Exhibit 54 in the deposition of Jetson representative, Sam Husain.
9. Attached as Exhibit 7 are the pertinent portions of plaintiffs treating counselor Malinda Tollefson's deposition taken on August 28, 2024.

I declare under penalty of perjury that the foregoing is true and correct.

Executed: January 22, 2025



Eugene M. LaFlamme